

1 SEONHAE SHIN (CA State Bar No. 308262)
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4 County Counsel
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6 San Bernardino, California 92415-0140
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9 Email: Kellie.Shin@cc.sbccounty.gov

10 Attorneys for Defendant CSA-18 SPECIAL DISTRICTS PUBLIC WORKS

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LYNN MACY, as an individual,

Plaintiff,

v.

CSA-18 SPECIAL DISTRICTS
PUBLIC WORKS, a public entity,

Defendant,

Case No. Case No. 5:24-cv-00902-AB-SHK

**DEFENDANT'S REQUEST FOR
JUDICIAL NOTICE**

*[Filed concurrently with 12(b) Motion to
Dismiss Plaintiff's Second Amended
Complaint and Proposed Order]*

Date: August 27, 2025

Time: 10:00 a.m.

Location: George E. Brown, Jr.
United States Courthouse
3470 12th St., Courtroom 3 or 4,
Riverside, CA 92501

Case Assigned to:
Honorable District Court Judge Andre
Birotte, Jr.

Referred to:
Honorable Magistrate Judge Shashi H.
Kewalramani

TO THE HONORABLE COURT, PLAINTIFF, AND HER ATTORNEY OF
RECORD, IF ANY:

PLEASE TAKE NOTICE that Defendant "CSA-18 SPECIAL DISTRICTS
PUBLIC WORKS ("Defendant") hereby requests the Court take judicial notice of the

1 following documents and information, pursuant to Evidence Code sections 451-453.

2 1) The Claim Rejection Letter sent to Plaintiff on March 23, 2023, attached hereto
3 as Exhibit A.

4 2) The San Bernardino County Office of the Assessor's Property Information
5 Management System- PIMS Package Report for the Mojave River Road
6 property as owned by corporation 1611Bible.US, attached hereto as Exhibit B.

7 A trial court may take judicial notice of legally operative documents if such
8 documents are relevant to ruling on the sufficiency of plaintiff's claims. Scott v. JPMorgan
9 Chase Bank, N.A. 214 Cal. App. 743 (2013). Courts may take judicial notice of an entity's
10 public records. This includes the filing and contents of a government claim, such as a
11 rejected tort claim letter, but not the truth of the statements contained within the document.
12 Gong v. City of Rosemead, 226 Cal. App. 4th 363 (2014). Taking judicial notice of these
13 documents is proper, as their authenticity, completeness and legal effect are not reasonably
14 in dispute.

15 The County also requests that the Court take judicial notice of the following facts:

16 1) Lynn Macy's claim was rejected on March 23, 2023; and
17 2) 1611BIBLE.US NON-PROFIT is the legal owner of the Mojave River
18 Road properties (which have been combined under APN 0343-031-05-
19 0000) at issue within Plaintiff's Second Amended Complaint.

20 Additionally, the Court may take judicial notice of its own records in this matter,
21 which would include the Plaintiff's Second Amended Complaint pursuant to Evidence
22 Code § 452. The items to be noticed are relevant to the Defendant's Motion to Dismiss
23 and establish the basis upon which the motion is brought.

24 DATED: July 25, 2025

TOM BUNTON

25 County Counsel

26 

27 SEONHAE SHIN
28 Deputy County Counsel
Attorneys for Defendant

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10 **EXHIBIT A**

11 **CLAIM REJECTION LETTER SENT TO PLAINTIFF**

12 **DATED MARCH 24, 2023**



Department of Risk Management

Victor Tordesillas
Director

Phone Number
909.386.8655

Fax Numbers
Admin/Fiscal: 909.382.3211
Workers Comp: 909.386.8711
Liability: 909.382.3211
Safety: 909.382.3212

March 24, 2023

Jeff & Lynn Macy
PO Box 103
Twin Peaks, CA 92391

RE: Claimant..... Jeff & Lynn Macy
Date of Loss..... 02/16/2023
Amount of Claim..... Undetermined
Our File..... 143546

Notice is hereby given that the claim which you presented to the County of San Bernardino on February 22, 2023 was rejected on March 24, 2023.

WARNING

Subject to certain exceptions, you have only six (6) months from the date this notice was personally delivered or deposited in the mail to file a court action on this claim. See Government Code Section 945.6.

You may seek the advice of an attorney of your choice in connection with this matter. If you desire to consult an attorney, you should do so immediately.

Respectfully,

Sophia Salas
Liability Claims Rep II
(909) 386-8638
DEPARTMENT OF RISK MANAGEMENT

BOARD OF SUPERVISORS

COL. PAUL COOK (RET.)
Vice Chairman, First District

JESSE ARMENDAREZ
Second District

DAWN ROWE
Chair, Third District

CURT HAGMAN
Fourth District

JOE BACA, JR.
Fifth District

BSWARa

Leonard X. Hernandez
Chief Executive Officer

PROOF OF SERVICE BY MAIL

STATE OF CALIFORNIA)
)
COUNTY OF SAN BERNARDINO)

I, the undersigned, declare:

I am employed in the County of San Bernardino, State of California; I am over the age of 18 years and not a party to this action; my business address is 222 West Hospitality Lane, Third Floor, San Bernardino, California, 92415-0016. I am familiar with this office's practice for collection and processing of documents for mailing with the United States Postal Service. The documents are deposited with the United States Postal Service on the same day in the ordinary course of business. On the date written below, I served the document named below on the parties indicated by placing a true copy thereof enclosed in a sealed envelope for collection and mailing from 222 West Hospitality Lane, Third Floor, San Bernardino, Ca. following ordinary business practice, addressed as follows, and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on March 24, 2023, at San Bernardino, California.

DOCUMENT: BSWARa

PARTIES SERVED:

Jeff & Lynn Macy
PO Box 103
Twin Peaks, CA 92391

Zyndie West
Declarant

10 **EXHIBIT B**

11 **SAN BERNARDINO COUNTY OFFICE OF THE ASSESSOR'S**
12 **PROPERTY INFORMATION MANAGEMENT SYSTEM**
13 **PIMS PACKAGE REPORT**
14 **PARCEL 0343-031-05-0000**

Property Information Management System

**San Bernardino County
Office of the Assessor**



PIMS PACKAGE REPORT FOR PARCEL 0343-031-05-0000

San Bernardino County Assessor



Property Information

Property Address (Main Situs) Protected per CA. Govt. Code
Sect. 6254.21

Protected per CA. Govt. Code
Sect. 6254.21

Owner and Mailing Address 1611BIBLE.US NON-PROFIT

C/O JEFF MACY
Protected per CA. Govt. Code
Sect. 6254.21
Protected per CA. Govt. Code
Sect. 6254.21

Effective Date 10/23/2024

Parcel 0343031050000

Parcel Status ACTIVE

Parcel Type REAL PROPERTY

Property ID

Tax Status ASSESSED BY COUNTY

Use Code VACANT

Land Access PUBLIC UNPAVED

Size 25.001 ACRES AND OVER

Land Type SINGLE FAMILY
RESIDENTIAL

District TWIN PEAKS

Resp Group REAL PROPERTY

Resp Unit RES ZONE(MAX 14
UTS)&USE EX HPC/MHM(1-
14 UTS,CHURC

Current Owners

Name 1611BIBLE.US NON-PROFIT

Document Numbers

20240234963

R/I SOLE OWNER

% Int 100.0000000

Type BILLED OWNER

Acquisition Date 10/01/2024

Document Date 10/01/2024

Inactive Date NONE

Legal Parcel Map

Parcel Map	Parcel Nbr	Unit	Book	Page
	0343031050000			

Legal Description

TRACT 1951 CEDARPINES HIGHLAND NO 4 LOTS 22 THROUGH 30, LOTS 37 THROUGH 40 BLK H
TOGETHER WITH TRACT 2341 LOT 1 TOGETHER WITH TRACT 1872 CEDARPINES HIGHLANDS
NO 1 LOTS 1 THROUGH 4, LOTS 6 & 7 BLK L

Legal Reason for Change

Legal Reason for Change	Document Number	Date
COMBINATION BY REQUEST		08/27/2024

San Bernardino County Assessor



Parcel History

Event Date	10/01/2024	Multi Parcel List
Event Group/Type	TRANSFER - 100% PER RECORDED DOCUMENT	
Multi Parcel	No	
Event Date	08/27/2024	Multi Parcel List
Event Group/Type	CREATE - COMBINATION	0343031050000 NEW-COM
Multi Parcel	Yes	0343025110000 OLD-COM
		0343025260000 OLD-COM
		0343025340000 OLD-COM
		0343025360000 OLD-COM
		0343025370000 OLD-COM
		0343025390000 OLD-COM
		0343025400000 OLD-COM
		0343031010000 OLD-COM
		0343062020000 OLD-COM
		0343062050000 OLD-COM
		0343062060000 OLD-COM
		0343062080000 OLD-COM
		0343062090000 OLD-COM

PROOF OF SERVICE

I am employed in the County of San Bernardino, State of California. I am a citizen of the United States, employed in the County of San Bernardino, State of California, over the age of 18 years and not a party to nor interested in the within action. My business address is 385 North Arrowhead Avenue, Fourth Floor, San Bernardino, CA 92415-0140.

On July 25, 2025, I served the following documents (*specify*): **DEFENDANT'S REQUEST FOR JUDICIAL NOTICE**

I served the documents on the persons below, as follows:

Lynn Macy, in Pro Per
P.O. Box #103
Twin Peaks, CA 92391
Tel: 909-744-8480
Email: 1611Bible.us@gmail.com;
1coolranger@gmail.com;
macybuilders@yahoo.com;
jerushastar@gmail.com

By United States Mail. I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

By e-mail or electronic transmission. I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America, that the above is true and correct.

DATED: July 25, 2024 /s/ Marisela Alonso
Marisela Alonso, Declarant